

EXHIBIT B

From: Christopher Sheean <csheean@smbtrials.com>
Sent: Saturday, June 28, 2025 12:42 PM
To: Ruskusky, John <jtruskusky@nixonpeabody.com>
Subject: RE: Sundyne Supplemental Production

John,

For the reasons we previously outlined, we believe that Sundyne has supplemented its production consistent with Judge Shah's ruling on our motion for summary judgment, and do not believe that the breach of the nondisclosure agreement entitles PeopleFlo to any additional documents beyond records of sales of CSA pumps that incorporate the purported combination trade secret.

Please let me know if you would like to schedule a call to discuss this further.

Regards,

Chris

Christopher T. Sheean
Swanson, Martin & Bell LLP
330 N. Wabash Ave.
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Chicago, Illinois 60611
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F: (312) 321-0990
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From: Ruskusky, John <jtruskusky@nixonpeabody.com>
Sent: Friday, June 27, 2025 4:14 PM
To: Christopher Sheean <csheean@smbtrials.com>
Subject: RE: Sundyne Supplemental Production

Caution: External email.

Chris – checking in. Please let me know the status. Thank you.

John

From: Christopher Sheean <csheean@smbtrials.com>
Sent: Monday, June 23, 2025 10:21 AM
To: Ruskusky, John <jtruskusky@nixonpeabody.com>
Subject: RE: Sundyne Supplemental Production

John,

My client is looking at this, and I hope to have an answer for you in the next few days. My apologies for the delay.

Chris

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From: Ruskusky, John <jtruskusky@nixonpeabody.com>
Sent: Thursday, June 19, 2025 3:40 PM
To: Christopher Sheean <csheean@smbtrials.com>
Cc: Marnie Sy <msy@smbtrials.com>
Subject: RE: Sundyne Supplemental Production

Caution: External email.

Chris - following up on this again. Please let me know. Thanks.

John

From: Ruskusky, John
Sent: Sunday, June 15, 2025 8:19 PM
To: 'Christopher Sheean' <csheean@smbtrials.com>
Cc: Marnie Sy <msy@smbtrials.com>
Subject: RE: Sundyne Supplemental Production

Chris – thanks, please let me know on the other items.

John

From: Christopher Sheean <csheean@smbtrials.com>
Sent: Thursday, June 12, 2025 10:47 AM
To: Ruskusky, John <jtruskusky@nixonpeabody.com>
Cc: Marnie Sy <msy@smbtrials.com>
Subject: Sundyne Supplemental Production

[EXTERNAL E-MAIL]

Be Aware of Links and Attachments

John,

I am still waiting to hear from my client on whether Sundyne is amenable to producing sales information for all CSA pumps. In the meantime, I can report that no additional sales of any kind have been made of CSA pumps that incorporate the “Bearings Technology Combination Trade Secret” as that was described in the Court’s ruling on summary judgment. The supplemental production made on 6/10/2024, SUN-PF54913-23, are the latest production related to those sales.

I hope to have an answer to the question of providing all CSA sales data by tomorrow evening.

Chris

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